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June 19, 2025

Honorable Michael A. Shipp, U.S.D.J.  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
402 East State Street  
Trenton, NJ 08608

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
402 East State Street  
Trenton, NJ 08608

***Re: Johnson & Johnson Talcum Powder Products, Marketing, Sales  
Practices and Products Liability Litigation  
Case No.: 3:16-md-02738-MAS-RLS***

Dear Judge Shipp and Judge Singh:

We thank the Court for its consideration of the Plaintiffs' Steering Committee's request to proceed with a bellwether trial at the earliest possible opportunity. Additionally, we recognize the Court's significant caseload and the need for assistance in addressing the numerous Rule 702 motions submitted by both parties.

In light of these circumstances, and given that the Lowenstein Sandler firm no longer represents the Johnson & Johnson Defendants, the Plaintiffs' Steering Committee has no objection to the Court's appointment of the Honorable Freda L. Wolfson, U.S.C.J. (retired), as the Special Master responsible for addressing the Rule 702 motions.

Hon. Michael A. Shipp, U.S.D.J.  
Hon. Rukhsanah L. Singh, U.S.M.  
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Upon Judge Wolfson's appointment pursuant to Rule 53, we look forward to meeting with her at the earliest feasible time to discuss the forthcoming process.

We appreciate the Court's attention to this matter.

Respectfully submitted,

*/s/ P. Leigh O'Dell*

*/s/ Michelle A. Parfitt*

P. Leigh O'Dell

Michelle A. Parfitt

cc: Jessica Brennan (via email)  
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